

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
INTEGRATED HEALTH SERVICES, INC., et al.,)	Case No. 00-389(MFW)
)	(Jointly Administered)
Debtors.)	
)	
)	
IHS LIQUIDATING LLC,)	
)	
Plaintiff,)	
)	C.A. No. 05-376(GMS)
)	
v.)	
)	
ACE INDEMNITY INSURANCE COMPANY)	
f/k/a INDEMNITY INSURANCE COMPANY)	
OF NORTH AMERICA,)	
)	
Defendant.)	

**NOTICE OF ORAL DEPOSITION OF CORPORATE DESIGNEE
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30 (B) (6)**

TO: James F. Harker, Esquire
Cohen, Seglias, Pallas, Greenhall & Furman, PC
Nemours Bldg. - Ste. 1130
1007 Orange Street
Wilmington, DE 19801

PLEASE TAKE NOTICE that, Defendant, ACE Indemnity Insurance Company, pursuant to Federal Rules of Civil Procedure 30(b)(6), will take the deposition upon oral examination of the corporate designee of General Star Management Company at 10:00 a.m. on Tuesday, February 20, 2007 and continuing daily until completed at offices of Chait Digital located at Two Stamford Landing, 68 Southfield Avenue, Stamford, CT 06901 before a notary or other officer of the Court.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), General Star Management Company must designate one or more of its officers, directors or managing agents or there persons who consent to testify on its behalf and is the person most knowledgeable concerning the subject matters set forth in Section “A” of this Notice.

A. AREAS OF INQUIRY

1. Person most knowledgeable of underwriting, reviewed application for insurance and issuance of binder and policy to Integrated Health Services, Inc. for the period January 1, 1999 to January 1, 2000 and for period January 1, 2000 to January 1, 2002.
2. Person most knowledgeable of underwriting, reviewed application for insurance and issuance of binder and policy to Integrated Health Services of Lester, Inc. for the period January 1, 1999 to January 1, 2000 and for period January 1, 2000 to January 1, 2001.
3. Person most knowledgeable with regard to the underwriting policies and procedures used by General Star Management Company in the review and issuance of Commercial Umbrella policies to Integrated Health Services, Inc. And Integrated Health Services of Lester, Inc. during the period January 1, 1997 to January 1, 2001.
4. Person most knowledgeable with regard to revisions and endorsements added to General Star Management company policies IXG-347714B and IXG-347714C.
5. Person most knowledgeable regarding contract with and retention of Hamlin & Burton Liability Management, Inc. to serve as claims administrator.

6. Person most knowledgeable regarding claims administration and oversight of administrator Hamlin & Burton Liability Management, Inc.

WETZEL & ASSOCIATES, P.A.

/s/Benjamin C. Wetzel, III

BENJAMIN C. WETZEL, III (ID No. 985)

1100 North Grant Avenue, Suite 201

Wilmington, DE 19805

(302) 652-1200

Attorney for Ace Indemnity Insurance

Company f/k/a Indemnity Insurance

Company of North America

Of Counsel:

Ward A. Rivers, Esquire

Deasey, Mahoney & Bender, Ltd.

1800 John F. Kennedy Blvd., Suite 1300

Philadelphia, PA 19103-2978

Date: February 6, 2007

CERTIFICATE OF SERVICE

I certify that on February 6, 2007, I electronically filed the within Notice of Deposition with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

Garven F. McDaniel, Esquire
Bifferato Gentilotti & Balick
P.O. Box 2165
Wilmington, DE 19899

James F. Harker, Esquire
Cohen, Seglias, Pallas, Greenhill & Furman, P.C.
Nemours Building, Suite 1130
1007 Orange Street
Wilmington, DE 19801

Christopher P. Simon, Esquire
Cross & Simon, LLC
913 N. Market Street, 11th Floor
Wilmington, DE 19801

and served through the U.S. Mail:

Lee W. Stemba, Esquire
Clement H. Berne, Esquire
Troutman Sanders, LLP
The Chrysler Building
405 Lexington Avenue
New York, NY 10174

Joshua W. Cohen, Esquire
Thomas O. Farrish, Esquire
John B. Nolan, Esquire
Day Berry & Howard, LLP
One Audubon Street, 6th Floor
New Haven, CT 06511

Leonard P. Goldberg, Esquire
Stevens & Lee, P.C.
1818 Market Street, 29th Floor
Philadelphia, PA 19103

George C. Campion, Esquire
Weiner Lesniak, LLP
629 Parsippany Road
Parsippany, NJ 07054-0438

WETZEL & ASSOCIATES, P.A.

/s/ Benjamin C. Wetzel, III
Benjamin C. Wetzel, III
ID No. 985
The Carriage House, Suite 201
1100 North Grant Avenue
Wilmington, DE 19805
(302) 652-1200
*Attorney for Defendant ACE Indemnity
Insurance Company f/k/a Indemnity
Insurance Company of North America*

Of Counsel:
Ward A. Rivers, Esquire
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